



Crown Castle  
3 Corporate Park Drive, Suite 101  
Clifton Park, NY 12065

May 17, 2019

**RECEIVED**

Town of Grafton  
Planning Department  
Joseph Laydon- Town Planner  
30 Providence Road  
Grafton, MA 01519  
508-839-5335 x1120

MAY 20 2019

**PLANNING BOARD  
GRAFTON, MA**

RE: Project: AT&T Mobility - Eligible Facilities Request  
Site Address: 20 Indian Path Road  
Site Number: 857736/471120

Dear Mr. Laydon:

AT&T Mobility (AT&T) is an existing wireless provider located on the telecommunications tower at 20 Indian Path Road and proposes to modify their existing equipment on the tower as follows: remove and replace existing antenna platform; remove six existing antennas and six existing RRH's (remote radio heads, non-antennas); relocate three existing antennas and three existing RRH's into different sectors on the tower; install six new antennas, nine RRHs, one DC6, two DC trunks and one fiber trunk on tower; install three RRHs at ground level.

Please refer to sheets C-3 & C-4 of the CD's for detail.

All work will be completed within the existing tower compound and on the tower only for the AT&T antenna modification.

As you know, on February 22, 2012, Congress enacted the "collocation-by-right" (Section 6409(a)), which mandates that state and local governments approve any "Eligible Facilities Request".

Under Section 6409(a)(2)(A)-(C), an "Eligible Facilities Request" is any request to modify a Tower or Base Station that involves "collocations of new Transmission Equipment," "removal," or "replacement" of Transmission Equipment. Six criteria have been outlined in the FCC Report and Order captioned, In re: Acceleration of Broadband Development by Improving Wireless Facilities Siting Policies (October 17, 2014) Final Rule codified at 47 CFR Parts 1 and 17 promulgating regulations interpreting and implementing the provisions of the Spectrum Act. The Regulations determined that any modification to an existing Tower that meets the criteria as set forth below, does not substantially change the physical dimensions of the existing Tower and an Eligible Facilities Request must be granted.

1. The modifications do not increase the height of the Tower by twenty feet or ten percent, whichever is greater. We are within the criteria of the mandate as the existing tower will not be increased.
2. The modifications to the Transmission Equipment do not protrude from the edge of the Tower by twenty feet or more than the width of the Tower (whichever is greater), at the level where the transmission equipment modifications are made;
3. The modifications to the Transmission Equipment do not involve the installation of more than standard number of equipment cabinets for the technology involved, not to exceed four;
4. The modifications to the transmission Equipment do not entail any excavation or deployment outside of the Tower site;
5. The modifications to the Transmission Equipment do not defeat any existing concealment elements of the Tower;
6. The modifications to the Transmission Equipment comply with prior conditions of approval of the Tower, unless the non-compliance is due to an increase in height, increase in width, addition of equipment cabinets, or new excavation that does not exceed the corresponding "substantial change" threshold in numbers 1-4.

The proposed modification complies with all federal, state, and local zoning and permitting requirements as is evidenced by the drawing provided on pages C-3 & C-4. The proposed scope of work will not increase the tower's height or width. The modification will not require excavation outside the tower site and/or compound as it presently exists. Lastly, the installation does not involve more than the standard number of equipment cabinets.

It is our expectation that this application will be processed without any further delay and in a manner consistent with the applicable federal legislation. Thank you in advance for your cooperation.

Please do not hesitate to contact me at the number below if you have any questions.

Sincerely,



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